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U. S. DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FILED

IN THE UNITED STATES DISTRICT COURT  
WESTERN DIVISION OF ARKANSAS  
TEXARKANA DIVISION

SEP 13 2006

CHRIS R. JOHNSON, CLERK

BY

CF  
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Plaintiff : Tamonica Parker

06-4077

vs.

Defendant: K & A's Liquor - 24324 Hwy 82 Garland City, AR 71839  
Ken Jackson - 24324 Hwy 82 Garland City, AR 71839  
Audra Jackson - 24324 Hwy 82 Garland City, AR 71839  
Cathy Haltom - 1750 Lafayette 27 Stamps, AR 71860

COMPLAINT

I, Tamonica Parker, am suing K&A Liquor for \$500,000.00. I am suing for mental stress, mental anxiety, depression, discrimination, mental anguish, to pay all hospital bills since occurrences, loss of work, and verbal abuse.

March 03, 2005: When I started to work, I was told the morning shift was for cleaning up, etc., but I was the only one doing it. Audra made a comment one day that she knew the cleaning up was not going to get done if I didn't do it because Lantz and Cathy was not going to do it. Both of them was making more than I was. Cathy was making \$11.00 an hour and Lantz was making \$9.00 an hour.

May 2005: I was told by an employee that those dummy cameras was put up because they were going to hire me and that I may decide to steal something and I would not because I will think they work.

December 23, 2005: I went to work sick. I was hurting all evening and all that night from 2p.m. to 10 p.m.. When I got off work that night I went to the emergency room later on that night. I had to be admitted to have surgery to have my appendix removed the next morning. Ken and Audra came up there. I thought they was coming out of sympathy and caring but they weren't. When I went back to work, Ken told the liquor sales person for Central Distributors out of Little Rock that they came to see if I was really telling them the truth. That really hurt my feelings because I thought they liked me as an employee, but they just liked all the hard work I was doing.

June 2006: An employee who was not working as long as I was, told people that they had gotten a raise, so I asked the question and the answer was yes for certain reasons though.

July 2006: Audra hugged Ken and said look at Annette she is jealous. I wasn't even looking at them. She just said that out of spite because she was standing beside Cathy. Then the telephone rung and Audra said it is probaly for you, Annette. I said probaly not. It was not. It was for Cathy.

August 2006: New rules was made stating use cellphones to a minimum and no sitting in the bud chair. Cathy saw me using my cellphone to call home since they didn't want us on the store phone, but I was only on it for a few minutes. I was on it long enough to tell my son something. She uses her cellphone and uses the store phone all the time and talk longer than any of us

would. She didn't like it because Richard was sitting in the bud chair and told that, but Rob would sit in it when he got ready.

August 2006: A sign was posted about checks. There were certain checks we could accept, including payroll checks. There was suppose to be a charge of \$2.00 per \$100.00. Certain people didn't have to pay that fee, mostly all white people. They said don't charge regular customers, but they were charging the black regular customers. Another thing, they gave the whites free buckets of ice, but when the blacks asked for free ice, they would tell them they don't have free ice. Cathy even started charging the blacks for cups of ice and gave most of the whites free cups of ice.

August 17, 2006: Ken came in later that morning after I opened up. He could only stay there a little while with me because he had an a visitor to show up and they left, leaving me to do everything. When he left there was a salesman there. It was not pertaining to work so if he was not going to help , he could have sent some help.

August 26, 2006: I was the only cashier left over there after 8:00p.m. on a Saturday night, usually the busiest day of the week. Normally there is two or three cashiers there at a time until 10:00p.m..

August 29, 2006: I called Ken after 7:30 a.m. when I got to work to see if Willie could work that evening with Cathy since Jennifer had called in that she could not come to work because she was headed back to the hospital and I was suppose to get off at 4:00p.m.. He said yes if that was o.k. with Cathy. When Cathy made it to work , I told her what Ken said. She flew all off the handle with me and told me that I had to stay since I was on salary. I said o.k., but I didn't know that Audra said we had to stay since we had extra workers that needed and wanted extra hours. Cathy just kept on hollowing stuff out at me. Then she told me to call Audra and I didn't. So she called and told a lie on me. Audra wouldn't talk to me. She said she was going to call Ken and let him handle it. Ken didn't call me. So I got tired of Cathy still talking so I told her if I knew it was going to cause such a problem I would have never asked for Willie. I told her I was quitting because I was tired of them treating me any kind of way. I made it to my car then Cathy called me back to the phone said Ken wanted to talk to me. Ken asked me not to quit . He said we needed to talk that he wanted me to meet him over to K&A's that next morning at 7:30 a.m..

August 30, 2006: When Ken made it to work, he seemed like he was mad at me. He spoke after I did. That was all he said for a good while. Then finally he asked me if I wanted to get paid by the hour or still on salary. He said that because the day before I told Cathy that if I had to stay that I wanted him to take me off salary. I told her I was tired I had opened up at 7:30 a.m. by myself and I knew I had to open up the next day at 7:30a.m. and I know I had atleast two deliveries with not too much help because Ken wouldn't stay long. She wanted me to stay until 9:00 p.m.. I also talked to Audra on the phone and told her I felt like they were discriminating against me and how I felt about the whole situation. The both of them always make excuses for Cathy. Then Audra told me that we need to have a meeting the two of them, me and Cathy away from the liquor store and that I needed to tell Cathy just what I was telling her, but her and Ken are the bosses. This was not the first time I have went to them about the same issues. They always take Cathy's side without investigating.

August 2006: I was told they were going to hire me some help. I had asked about Willie (whom was already working on the weekend) helping me. They didn't so I paid him out of my own pocket to help me because I still hurt sometimes after having my surgery. Audra payed me part of it back after I complained some, but I told her she didn't have to because I know she didn't really want to. Then they were suppose to hire a white lady to help me, but on the day I really needed her she was not there.

September 2, 2006: Cathy, Ken, Audra and some friends met up at K&A's to go to Westshores to eat and have fun. Ken told Annette he just put up with Cathy because her and Audra have been friends for a long time. You can not mix friendship with business when trying to run a business. Everyone should be treated equal.

September 4, 2006: On Labor Day Ken came in that morning and worked a little while with Cathy and Lishella all as cashiers for some time. Cathy was the only one stayed until 4:00p.m. then I was the only cashier. I thought that was wrong especially on a holiday. It tends to get busy on holidays at this place. I worked from 4:00 p.m. to 9:00 p.m. as the only cashier.

September 5, 2006: I opened up at 7:30 a.m.. Ken had been over before then. Later on him and Audra came by to sign some checks. Willie was there helping me and Audra came in and asked what was he doing there. I told her he was there because my parents and family felt I was more safer there if I was not alone. Plus he needed some extra money to pay bills. I didn't see what the problem was because he was already working there he wasn't just somebody off the streets. He was also there to help me clean and stock so I wouldn't have to do it all alone. I don't know what the problem is, none of them are hardly ever alone.

September 6, 2006: I opened alone at 7:30 a.m.. Ken came about 8:45 a.m. and stayed until 9:37 a.m.. I had liquor delivery at 7:30a.m.. Before they could leave, Budweiser delivery was there. Plus I was expecting Boll's delivery. When Ken came I had put up most of the liquor. Ken left. So I tried to call Cathy on both her house and her cellphone she would not answer. Then I told my mom to call and see if she would answer if she didn't know the number and she did. Then she called me back and lied on my mom. I told her that I needed some help that I wanted to see if I could call Lori, the lady they suppose to have hired to help me in the first place. She said yes call her. I called her but by the time she madded to work, I was finish with deliveries. Boll's didn't come until later.

September 7, 2006: When I opened up at 8:00a.m., a lot of stuff from the day before Boll's delivery was just stacked up at the back by where it go. They didn't try to put it up on the shelves, etc. like it go. Plus, they didn't even stock the coke, ets. coolers in the front. There were four people working the day before so there was no reason I should have had to come in and do it. Ken came in later and handed me a new schedule, changing me from morning to nights. I asked him what was this. He said he was changing me since I didn't like mornings. I told him I would have not asked for days in the first place if I didn't want to work mornings. Ken didn't say anything else. I started crying and asked him who was getting my mornings, he said they were going to be split between Cathy and Lori. I was mad. I couldn't stop crying. I was really hurt and felt like he had really discriminated against me. I was so upset my head and chest began to hurt. My heart started to beat fast. So I asked for my pay. Ken wrote my check out and laid it down beside me and walked back to the other register. I then gave him the store keys that I had and left. I cried so until I had to go to the emergency room. They had to put me on stress medicine.

September 8, 2006: Ken opened up at 7:30a.m.. Laura made it to work about 9:00 a.m.. Ken worked until about 1:30 I know with Lori, but couldn't be there to open up with me or work with me for a little while. At 5:00 p.m. there was five people over there working: Lori, Ken, Cathy, Lishella, Nick, and Willie. Why couldn't I get help?

When I was working with Cathy, I did all of the cleaning, most of the stocking and almost all of the waiting on customers. She would sit back on the stool and watch television. Even when I had more than one customer. Sometimes they would be in a line.

My oldest brother came in the store and bought something for one of his friends. Cathy came in and walked over and opened the sack and looked in it as if I had gave him something. I didn't give away anything nor did I steal anything. I don't steal.

I would get so stressed out sometimes because they would sell to minors sometimes and I knew them. I had warned them several times that I knew them and that they were not old enough. I was praying that they didn't get down the road and get hurt real bad or killed. I would not sell to them. So they would tell me that the others would.

Everything that Cathy would tell Audra or Ken they would believe it. They would put up new rules or mention it to us without getting our side of it. They would always take her side. Especially against mine.

There was another black, young lady working over there name Shaun. She was friends with me and a white lady working over there name Becky. Shawn and Becky began to get close friends like me and Shawn. They didn't like that. They wanted to know why they had gotten so close? Made the remark about Becky hanging at the club with us, that she must be dating one of our friends, referring to a black man. The next thing we knew they started complaining that Shawn was not doing her job and fired her. After that she would come in to purchase something and talk to us for a while, then they found out and said to tell her that she couldn't hang out over there, but Cathy always had someone there talking to her.

Audra made the comment that nobody was going to be off for Christmas this year that everyone had to work, referring to me. I told her that I would have been there if I didn't have to go in the hospital for a life-threatening situation. I was not off just having fun.

Before I left I was doing most of the cleaning, most of the stocking in the front, getting the credit/debit card statements in order, coke order, cigarette, etc. order together, but was getting paid \$125.00 less than Cathy. Cathy did not clean, not hardly ever stock, on delivery days she didn't hardly ever put up much merchandise. She did the liquor and beer orders, plus enter inventory in the computer, which they didn't show me how to do, otherwise I would have been doing that, but then I would have access to steal if I were going to. Another thing, on Saturday nights, I had to be in charge of everyone and close the store and I felt like I was being underpaid.

I found five packs of Marlboro cigarettes out back by the trash bin when I took a bag of trash out. I brought them back in and gave them to Ken and told them where I found them. Me and Ken then did inventory and they did belong in the store. So, when Cathy came to work she said, well Annette you put up the cigarettes from the order the day before, didn't you? Trying to make it seem like I may have put them out there. I told her if I had gotten them, I would have been crazy to bring them back in there.

In August there were people coming over to the liquor store interested in buying it. So one Saturday, a man (whom we were told was their landlord in Arkadelphia) came over with Ken and Audra to see the store. They were showing him everything and introducing him to us. When Audra went to show him the security cameras, she said we got this just in case Annette decides to slip her hands in the drawer. I was so upset. I told her I don't steal before I did that I would ask for whatever I needed. Remarks like that is racial to me because I was the only black cashier there.

There are more issues about the ABC man and also about asking employees about selling them drugs.

I have witnesses for the complaints. I would like a jury trial.

*Tamonica Parker*

Tamonica Parker

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